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May 20, 2019

**VIA ECF**

Honorable Lorna G. Schofield  
United States District Judge  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**RE: *Contant, et al. v. Bank of America Corp., et al.*, No. 17-cv-3139**

Dear Judge Schofield:

Plaintiffs respectfully write to request permission to file a memorandum of law not to exceed 70 pages in support of their motion for preliminary approval of settlements, which Plaintiffs anticipate filing on Friday, May 24, 2019.

During the November 15, 2018 hearing regarding Plaintiffs' prior motion for preliminary approval of the Citigroup Settlement, the Court requested information pertaining to the number of class members and total potential damages to determine whether the Citigroup Settlement is fair, reasonable, and adequate, *See* ECF No. 181 (Transcript of Nov. 28, 2018 Hearing). The requested page enlargement will enable Plaintiffs to address the information requested by the Court and the factors weighing in favor of Plaintiffs' requests with respect to the Citigroup Settlement as well as a second settlement to be submitted for preliminary approval concurrently with Plaintiffs' forthcoming preliminary approval motion.<sup>1</sup>

Counsel for the Settling Defendants do not oppose this application. No previous page-extension request has been made with respect to this brief in support of Plaintiffs' motion for preliminary approval.

Respectfully submitted,

/s/ Michael Dell'Angelo  
Michael Dell'Angelo  
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<sup>1</sup> Plaintiffs notified the Court of the second Settlement by letter on February 14, 2019, requesting that the letter not be filed on the public docket because the fact of the Settlement was not yet public. Counsel for Plaintiffs have agreed not to make public the identity of the second Settling Defendant in advance of Plaintiffs' motion for preliminary approval of the Settlements.

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